

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

BING GUAN, GO NAKAMURA, MARK  
ABRAMSON, KITRA CAHANA, and ARIANA  
DREHSLER,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary of the U.S.  
Department of Homeland Security, in his official  
capacity; TROY MILLER, Acting Commissioner of  
U.S. Customs and Border Protection, in his official  
capacity; TAE JOHNSON, Acting Director of U.S.  
Immigration and Customs Enforcement, in his official  
capacity,

Defendants.

No. 1:19-CV-6570 (PKC/MMH)

**NOTICE OF MOTION TO WITHDRAW AS ATTORNEY OF RECORD**

TO: THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 1.4, Sarah Taitz of the American Civil Liberties Union Foundation hereby moves to withdraw as counsel for Plaintiffs Bing Guan, Go Nakamura, Mark Abramson, Kitra Cahana and Ariana Drehsler in the above captioned matter. Plaintiffs remain represented by their other attorneys of record and no substitution of counsel will therefore be necessary. Please remove Sarah Taitz from the docket as counsel of record.

Dated: September 14, 2023  
New York, New York

Respectfully submitted,  
By: s/ Sarah Taitz  
Sarah Taitz  
American Civil Liberties Union  
Foundation  
125 Broad Street, Floor 18  
New York, NY 10004  
staitz@aclu.org  
*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

BING GUAN, GO NAKAMURA, MARK  
ABRAMSON, KITRA CAHANA, and ARIANA  
DREHSLER,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary of the U.S.  
Department of Homeland Security, in his official  
capacity; TROY MILLER, Acting Commissioner of  
U.S. Customs and Border Protection, in his official  
capacity; TAE JOHNSON, Acting Director of U.S.  
Immigration and Customs Enforcement, in his official  
capacity,

Defendants.

No. 1:19-CV-6570 (PKC/MMH)

**DECLARATION OF MITRA EBADOLAHİ PURSUANT TO LOCAL CIVIL RULE 1.4**

I, Sarah Taitz, respectfully declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746 that the following is true and correct:

1. I am a Fellow employed by the ACLU Foundation. I have served in this capacity since September 2021. I am licensed to practice law by the State of New York.
2. I have been attorney-of-record in this case since I entered an appearance on February 13, 2023.
3. The procedural posture of the case is as follows: the parties are in the midst of discovery, which is governed by the Court's Scheduling Order of July 24, 2023.
4. I am moving to withdraw as counsel for the plaintiffs in this case because I am ending

- my employment at the ACLU Foundation, effective September 15, 2023.
5. My departure from the ACLU Foundation provides a satisfactory reason for, and requires, my withdrawal as an attorney in this case. My colleague Esha Bhandari has served as co-counsel in this case from the beginning and will continue as counsel for Plaintiffs in this action. Ms. Bhandari will capably represent Plaintiffs' interests in the future.
6. Since this is a government case, there is no retaining or charging lien involved.

Dated: September 14, 2023  
New York, New York

Respectfully submitted,  
By: s/ Sarah Taitz  
Sarah Taitz  
American Civil Liberties Union  
Foundation  
125 Broad Street, Floor 18  
New York, NY 10004  
staitz@aclu.org  
*Attorney for Plaintiffs*

## CERTIFICATE OF SERVICE

This is to certify that true and correct copies of the foregoing **Notice of Motion to Withdraw as Attorney of Record by Sarah Taitz** were filed electronically on September 14, 2023, with the United States District Court for the Eastern District of New York.

Notice of this filing will be sent via electronic mail to all parties who have entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

Dated: September 14, 2023  
New York, New York

Respectfully submitted,  
By: s/ Sarah Taitz  
Sarah Taitz  
American Civil Liberties Union  
Foundation  
125 Broad Street, Floor 18  
New York, NY 10004  
staitz@aclu.org  
*Attorney for Plaintiffs*